

Exhibit D

Budget and Staffing Plan

Exhibit D-1

Budget Plan for the Compensation Period

Matter ID	Matter	Feb 2020		March 2020		April 2020		May 2020	
		Actual Fees	Estimated Fees	Actual Fees	Estimated Fees	Actual Fees	Estimated Fees	Actual Fees	Estimated Fees
33260.0022	PROMESA TITLE III: PREPA	\$358,978.80	\$375,000	\$285,780.30	\$350,000	\$220,713.30	\$295,000	\$298,476.30	\$310,000
33260.0032	PREPA TITLE III - FINANCING MOTIONS	\$0.00	\$0	\$0.00	\$0	\$63,392.10	\$0	\$0.00	\$0
33260.0054	PREPA TITLE III - PREC	\$1,656.90	\$2,500	\$0.00	\$2,500	\$157.80	\$2,500	\$315.60	\$2,500
33260.0055	PREPA TITLE III - VITOL	\$10,572.60	\$15,000	\$42,132.60	\$35,000	\$215,247.60	\$240,000	\$270,951.00	\$300,000
33260.0056	PREPA TITLE III - UTIER CBA	\$242,971.80	\$250,000	\$172,485.30	\$175,000	\$94,304.70	\$110,000	\$124,938.00	\$145,000
33260.0059	PREPA TITLE III - MISCELLANEOUS	\$81,757.50	\$100,000	\$27,696.00	\$50,000	\$1,025.70	\$20,000	\$236.70	\$10,000
33260.0070	PREPA TITLE III - UTIER V. ORTIZ VAZQUEZ	\$1,341.30	\$5,000	\$4,908.60	\$5,000	\$3,629.40	\$5,000	\$39,508.20	\$50,000
33260.0075	PREPA TITLE III - COSTA SUR INSURANCE RECOVERY ACTION	\$26,510.40	\$27,500	\$33,910.50	\$45,000	\$65,408.10	\$75,000	\$39,612.30	\$50,000
33260.0079	PREPA TITLE III - FUEL LINE LENDERS' ACTION REGARDING LIEN	\$26,336.40	\$10,000	\$78.90	\$0	\$0.00	\$0	\$315.60	\$0
33260.0085	PREPA TITLE III - COBRA ACQUISITION LLC	\$78.90	\$0	\$101,781.00	\$120,000	\$81,184.50	\$90,000	\$24,264.00	\$40,000
33260.0086	PREPA TITLE III - SREAE V. FOMB	\$6,000.60	\$10,000	\$0.00	\$10,000	\$0.00	\$0	\$552.30	\$0
33260.0095	PREPA TITLE III - INSURANCE COVERAGE ADVICE	\$3,077.10	\$5,000	\$1,735.80	\$5,000	\$8,363.40	\$10,000	\$15,076.20	\$10,000
PREPA Total		\$759,282.30	\$800,000	\$670,509.00	\$797,500	\$753,426.60	\$847,500	\$814,246.20	\$917,500
ESTIMATED FEES Compensation Period (February 2020 - May 2020) TOTAL:									\$3,362,500.00
ACTUAL FEES Compensation Period (February 2020 - May 2020) TOTAL:									\$2,997,464.10
Percent Variance (Actual vs. Budgeted Fees)									10.9% below budget

Exhibit D-2

Staffing Plan for the Compensation Period

Staffing Plan for the Compensation Period

Category of Timekeeper¹	Number of Timekeepers Expected to Work on The Matter During the Budget Period²	Average Hourly Rate³
Partners	24	\$789
Senior Counsel	6	\$789
Associates	32	\$789
e-Discovery Attorneys	8	\$390
Paraprofessionals	20	\$270
Total:	90	

¹ Attorney Practice Groups: BSGR&B; Litigation; and Corporate.

² The chart reflects Proskauer's staffing plan for the designated period based on currently foreseeable activities. Actual staffing needs, including additional attorneys, may vary materially based on actual facts and circumstances arising in the designated period, including as a result of currently unanticipated disputes. The staffing plan currently includes attorneys from the BSGR&B, Litigation, and Corporate practice groups. The expertise of attorneys from other specialized areas is likely to be required during the course of these PROMESA Title III cases.

³ As explained in the Application, Proskauer's Engagement Letter provides as of January 1, 2020 for rates 4% higher than these rates, but Proskauer agreed not to request allowance and payment of the incremental rates until after confirmation of a plan of adjustment for the Commonwealth or a final fee application.